

United States District Court
For The District Of Massachusetts.

Manuel Vera Betancourt

Petitioner

CA. No. 04-11876 - RCL

vs.

Alberto Gonzalez, Attorney General for
the United States, et, al

Petitioner's Motion to Add Another
Ground to his Writ of Habeas Corpus.

Petitioner in the above matter respectfully moves the court to enlarge his petition for a writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 to add another basis for release, under the United States Supreme Court's recent decision in *Clark V. Martinez*, 543 U.S. (2005), which is pertinent to Petitioner's writ of Habeas Corpus. In *Clark* the Supreme Court affirmed the District Court's determination that removal to CUBA is not reasonably foreseeable, and the habeas petitions should have been granted.

Also as in *Zadvydas*, the Court further held that the presumptive period during which an Alien's detention is reasonably necessary to effectuate removal is six months, and that he must be

Conditionally released after that time if he can demonstrate that there is "No significant likelihood of removal in the reasonably foreseeable future".

533 U.S. at 701

The Supreme Court also stated "[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized" Id. at 699

Wherefore, petitioner request this Honorable Court to please grant him release from custody in order to return to his Wife and Daughter and to be a positive contributor to society.

Respectfully Yours.
Manuel Vera Betancourt

Manuel Vera Betancourt.

Pro Se.

P.C.C.F

26 Long Pond Road

Plymouth, MA 02360